

THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

SAUDDY NOEMI HERNANDEZ ONEILL  
JOAN LAUREANO COLON

DEBTORS

CASE NO. 19-06674/EAG

CHAPTER 13

**DEBTORS' MOTION FOR ADDITIONAL EXTENSION OF TIME TO REPLY  
TO TRUSTEE'S UNFAVORABLE RECOMMENDATION (DOCKET NO. 37)  
RE: *ORDER*, Docket No. 41**

TO THE HONORABLE COURT:

**NOW COME, SAUDDY NOEMI HERNANDEZ ONEILL and JOAN LAUREANO COLON**, the Debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. On January 18, 2024, this Honorable Court issued an *ORDER*, Docket No. 41 whereby the Debtors were granted 14 days to reply to a Trustee's unfavorable recommendation filed on 1/8/2024 (Docket No. 37), in the above captioned case.
2. That on January 31, 2024, the undersigned attorney discussed with the Chapter 13 Trustee the pending issues in the present case.
3. On January 31, 2024 the Debtors met with their under signed attorney to discuss this matter in order reply to the Trustee's unfavorable recommendation (Docket No. 37).
4. The Debtors respectfully state that they are in the process of obtaining additional documents/information to file an *Amended Post-Confirmation Modified Plan* and *Amended Schedule J*, in the above captioned case.

5. Based on the aforementioned, the Debtors respectfully request an additional extension of time of seven (7) days within to file the above stated amendments, which would cure the objection raised by the Trustee in his unfavorable recommendation (Docket No. 37). This extension of time to expire on February 8, 2024.

**WHEREFORE**, the Debtors, through his undersigned attorney respectfully request that for the above stated reasons this Honorable Court grant the requested extension of time.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtors to the address of record.

**RESPECTFULLY SUBMITTED**, in San Juan, Puerto Rico, this 1<sup>st</sup> day of February, 2024.

**/s/ Roberto Figueroa Carrasquillo**  
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